Nitrogen Balancing

Available

- Nitrogen applied as fertilizers, teas, etc.
  - (lbs of N per acre)
- Nitrogen in soil
  - (lbs of N per acre)
- Nitrogen in irrigation water
  - (lbs of N per acre)

Needed by crop

- Crop uptake
  - (lbs of N per acre)

Nitrogen Balancing

Needed by crop

- **Crop uptake**
  - **(lbs of N per acre)**

Broccoli:	**180-220**
Cauliflower	**180-220**
Celery	**200-240**
Lettuce	**80-120**

Nitrogen Balancing

Needed by crop

- **Crop uptake**
  - **(lbs of N per acre)**

Broccoli:	**180-220**
Cauliflower	**180-220**
Celery	**200-240**
Lettuce	**80-120**

- **Some crops not studied**
  - **and we need to learn the values being used**
- **For all crops, we need to learn what values the grower is using so that we understand the problem**

Nitrogen Balancing

Available

- Nitrogen applied as fertilizers, teas, etc.
  - (lbs of N per acre)
- Nitrogen in soil
  - (lbs of N per acre)
- Nitrogen in irrigation water
  - (CONCENTRATION)

Needed by crop

- Crop uptake
  - (lbs of N per acre)

Nitrogen Balancing

Available

- Nitrogen applied as fertilizers, teas, etc.
  - (lbs of N per acre)
- Nitrogen in soil
  - (lbs of N per acre)
- Nitrogen in irrigation water
  - (load in lbs of N per acre)

Needed by crop

- Crop uptake
  - (lbs of N per acre)

SUPPORT

- Eliminate toxic discharges of agricultural pesticides to surface waters and groundwater
  - February 2010 language focusing on TOXICITY
- Reduce nutrient discharges to surface waters to meet nutrient standards
  - Meet nutrient balancing ratios for high risk Tier 3
- Reduce nutrient discharges to groundwater to meet groundwater standards
  - Meet nutrient balancing ratios for high risk Tier 3
- Minimize sediment discharges from agriculture lands
  - Control sediment within 3 years (February 2010)
- Protect aquatic habitat (riparian areas and wetlands) and their buffer zones
  - 100, 75, or 50-foot stream buffers to protect water quality

SUPPORT

- (p 26) Addition of “improved” to 87.5 .

- (p 33) Nitrate level is projected to be within 50% of MCL
  - Caveat that we still believe all drinking water wells should be tested (support August 20 draft).

- (pgs 47-49 and various) Total nitrogen in the soil

- (pgs 58-62) Inclusion of Nitrogen parameters in Annual Compliance Form
  - Caveat that LOAD of N in irrigation water
  - Caveat that Crop Uptake should also be included

OPPOSE

- (p 14) Language biasing RWQCB towards third party programs
- (p26) Oppose adding provision 33 to 87.5 .
- (p34) Oppose deletion of language “include two initial sampling rounds(one Spring, one Fall)
- (pg 42) “Where water is reapplied as irrigation water, Dischargers shall document reuse in the Farm Plan (Annual Compliance Form)
- Oppose any modifiers to “Cause and contribute” language


09.15.2009